

DOCKET # X06-UWY-CV-14-6025333-S : SUPERIOR COURT
:
ROBIN SHERWOOD, ET AL : J.D. OF WATERBURY
:
v. : COMPLEX LITIGATION DOCKET
:
STAMFORD HEALTH SYSTEM, ET AL : OCTOBER 7, 2016

**ETHICON, INC.'S OBJECTIONS TO
PLAINTIFFS' REQUESTS FOR PRODUCTION**

Pursuant to Connecticut Superior Court Rule Section 13-10, the undersigned, on behalf of Defendant Ethicon, Inc., and on behalf of its division, Ethicon Women's Health & Urology (also incorrectly named as "Gynecare") (hereinafter collectively "Ethicon"), hereby files Ethicon's objections to Plaintiffs' Requests for Production dated September 7, 2016, as set forth below.

**GENERAL OBJECTIONS APPLICABLE TO
ALL REQUESTS**

1. Ethicon responds to these Requests for Production solely on behalf of Ethicon, Inc., and on behalf of its division Ethicon Women's Health & Urology, and not on behalf of Johnson & Johnson.

2. Ethicon's specific objections to each Request are in addition to the objections set forth in these General Objections. The General Objections form a part of Ethicon's response to each and every Request, and are set forth here to avoid the duplication and repetition of restating them for each response. Thus, the absence of a reference to a General Objection is not to be construed as a waiver of the General Objections as to each specific Request.

3. Ethicon objects to any Request that is overly broad or unduly burdensome.

4. Ethicon objects to any Request that seeks the production of documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

5. Ethicon objects to any Request seeking information or material pertaining to alleged side effects or adverse events other than the injuries alleged in this lawsuit to have been sustained by Plaintiff, Robin Sherwood.

6. Ethicon objects to any Request seeking information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute.

7. Ethicon objects to any Request seeking information or material pertaining to time periods that are not relevant to this case, including, but not limited to, time periods subsequent to April 12, 2006, and to any Request seeking information about labeling or regulatory proceedings outside of the United States. Ethicon's objections to such Requests are based, *inter alia*, on the grounds that such information is not relevant or material to any issue in this lawsuit, nor is it reasonably calculated to lead to the discovery of information relevant or material to any issue in this lawsuit.

8. Ethicon objects to any Request that is vague, ambiguous, or confusing and, therefore, not susceptible to a clear and definitive answer. Such Requests necessarily require interpretation by Ethicon. Such interpretation by Ethicon may, in some or all cases, be different from that which Plaintiff intended. Therefore, Ethicon hereby puts Plaintiff on notice that such interpretation has necessarily taken place in providing answers to the requests herein as a result of Plaintiff's imprecise and ambiguous Requests.

9. Ethicon objects to these Requests to the extent they seek the production or identification of documents which are not within Ethicon's possession or control, or which has been produced by other parties to this litigation. Ethicon also objects to these Requests to the

extent they seek information from corporate entities other than Ethicon, including, but not limited to, Johnson & Johnson.

10. Ethicon objects to these Requests to the extent they seek the production of documents or information that is protected from disclosure by the attorney-client privilege, the “work product doctrine,” the self-critical analysis privilege, privacy laws, or any other applicable privileges, immunities, and/or doctrines of state law. Such information or material will be withheld.

11. To the extent that any Request seeks the production of privileged material, Ethicon’s limited or conditioned production of any documents protected by any privilege or immunity, including, but not limited to, the attorney-client privilege, the “work product doctrine,” the self-critical analysis privilege, privacy laws, or any other applicable privileges, immunities, and/or doctrines of state law is not intended to be, and shall not be construed to be, a waiver of any such privilege or protection.

12. Ethicon objects to these Requests to the extent that either the Requests or Ethicon’s responses to them may be construed as admissions by Ethicon that any fact or circumstance alleged in any Request occurred or existed. Moreover, the responses provided are not intended to be, and shall not be construed to be, an agreement or concurrence by Ethicon that the Plaintiff’s characterization of any facts or circumstances is correct.

13. Ethicon objects to these Requests to the extent they seek identification and/or organization of documents in any specific order or grouping.

14. Ethicon objects to these Requests to the extent they purport to impose obligations beyond those required by Connecticut Superior Court Rules and any Case

Management Orders or other rulings entered in this matter, and to the extent that they seek information beyond the scope permitted by such rules and orders.

15. Ethicon objects to any Request that calls for a legal conclusion, or that purports to require Ethicon to form, read, set forth, or perform a legal analysis. Ethicon is only required to provide factual information in responding to any Request. To the extent that any Request seeks something other than factual information, Ethicon objects to such Request as improper.

16. Ethicon objects to these Requests on the ground that they are overbroad by not being constrained to a reasonable time frame.

17. Ethicon objects to any Request that seeks trade secret, proprietary and/or confidential information, and the provision of any such information herein is subject to the Protective Order to be entered by the Court.

18. Ethicon's investigation is ongoing and Ethicon reserves the right to supplement all responses as information becomes available during the course of discovery, document review and investigation.

19. Ethicon reserves its right to amend or modify these answers at any time should it discover information that makes the present response incomplete or inaccurate. By reserving such right, Ethicon does not intend to assume a duty to modify or amend these responses, other than as required by Connecticut Superior Court Rules. In providing these responses and disclosing any information, Ethicon does not intend to waive any objections as to relevancy, materiality, or admissibility of evidence in this matter or any other matter or proceeding.

REQUESTS FOR PRODUCTION

2) A copy of the documents identified in response to Interrogatory # 3.

OBJECTION TO REQUEST NO. 2:

Ethicon objects to Request No. 2 on the grounds that it is overbroad, unduly burdensome, vague, ambiguous and confusing. Ethicon interprets this Request as a request for information relating to the treatment of plaintiff Robin Sherwood. Ethicon further objects to this Request on the grounds that it seeks the production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ethicon also objects to this Request to the extent that it requests information that is protected by the Health Insurance Portability and Accountability Act of 1996, Pub. L. No. 104-191, 110 Stat. 1936, 21 C.F.R. § 20.63 ("HIPAA"), other federal and state privacy laws, and the medical privilege laws of applicable states. Ethicon further objects to this Request on the grounds that it does not render medical care to any individual, including Robin Sherwood.

3) A copy of the documents identified in response to Interrogatory # 4.

OBJECTION TO REQUEST NO. 3:

Ethicon objects to Request No. 3 on the grounds that it is overbroad, unduly burdensome, vague, and ambiguous. Ethicon further objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon further objects to this Request on the grounds that it seeks the production of documents that are protected by the attorney-client privilege and/or work product immunity. Ethicon further objects to this

Request on the grounds that it seeks the production of information that is confidential, proprietary business information and/or trade secrets. Ethicon further objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ethicon also objects to this Request to the extent that it requests information that is protected by HIPAA, other federal and state privacy laws, and the medical privilege laws of applicable states.

- 4) A copy of the declaration page(s) evidencing the insurance policy or policies identified in response to Interrogatories #6 and #7.**

OBJECTION TO REQUEST NO. 4:

Ethicon objects to Document Request No. 4 on the grounds that it is overbroad, unduly burdensome, vague and ambiguous.

- 5) A copy of any reservation of rights, letter(s) and/or disclaimer letter referred to in Interrogatory No. #8.**

OBJECTION TO REQUEST NO. 5:

Ethicon refers to its Objections to Request No. 4.

- 6) A copy of any non-privileged statements, as defined in Practice Book Section 13-1 of any party or any witness who may have information pertaining to the product at issue in this lawsuit, concerning this action or its subject matter with a privilege log for any documents withheld.**

OBJECTION TO REQUEST NO. 6:

Ethicon refers to its Objections to Request No. 3.

- 7) Any reports of experts referred to in Interrogatory #9.**

OBJECTION TO REQUEST NO. 7:

Ethicon objects to Document Request No. 7 on the grounds that it is overbroad, unduly burdensome, vague and ambiguous. Ethicon also objects to this Request as

premature. Defendant has not yet decided which experts will be utilized in this matter. Ethicon further objects to this Request as calling for information that is protected by the attorney-client privilege and the work product doctrine, and as calling for the trial strategy of counsel. Ethicon further objects to this Request on the grounds that it seeks the production of information that is confidential, proprietary business information and/or trade secrets.

- 8) **A copy of the expert's current curriculum vitae and any file of any experts referred to in Interrogatory #9.**

OBJECTION TO REQUEST NO. 8:

Ethicon refers to its Objections to Request No. 7.

- 9) **Any documents disclosed to other Plaintiff or by other plaintiffs in relation to any other pelvic mesh litigation in which Johnson & Johnson is involved.**

OBJECTION TO REQUEST NO. 9:

Ethicon objects to Request No. 9 on the grounds that it is overbroad, unduly burdensome and vague. Ethicon further objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit. Ethicon further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege and/or the work product immunity. Ethicon further objects to this Request on the grounds that it seeks the production of information that is confidential, proprietary business information and/or trade secrets. Ethicon further objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

10) A copy of any documents that are the subject of Interrogatory # 16.

OBJECTION TO REQUEST NO. 10:

Ethicon refers to its Objections to Request No. 3.

11) A copy of any documents that are the subject of Interrogatory #18.

OBJECTION TO REQUEST NO. 11:

Ethicon objects to Request No. 11 on the grounds that it is overbroad, unduly burdensome, vague, ambiguous and confusing. Ethicon further objects to this Request on the ground that it seeks the production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ethicon further objects to this Request on the grounds that Ethicon does not render medical services to any individual, including plaintiff Robin Sherwood.

13) A copy of any documents that contain the information that is the subject of Interrogatory #22.

OBJECTION TO REQUEST NO. 13:

Ethicon objects to Request No. 13 as overbroad, unduly burdensome, vague, ambiguous, argumentative, calling for legal conclusions and/or speculation. Ethicon objects to this Request on the grounds that it assumes facts neither in evidence nor admitted. Defendant denies any allegations contained in this Request. Ethicon objects to this Request to the extent that it seeks, in part, information which is publicly available and therefore equally accessible to Plaintiff as it is to Defendant. Ethicon further objects to this Request on the ground that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ethicon also objects to this Request to the

extent that it requests information that is protected by HIPAA, other federal and state privacy laws, and the medical privilege laws of applicable states.

14) The documents contain [sic] in the file referenced in #25.

OBJECTION TO REQUEST NO. 14:

Ethicon objects to Request No. 14 on the grounds that it is overbroad, unduly burdensome, vague, ambiguous and confusing. Ethicon further objects to this Request on the ground that it seeks the production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ethicon further objects to this Request on the grounds that it seeks the production of documents that are protected by the attorney-client privilege and/or work product immunity. Ethicon further objects to this Request on the grounds that it seeks the production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

15) All reports submitted to you by Stamford Hospital related to pelvic mesh products.

OBJECTION TO REQUEST NO. 15:

Ethicon refers to its Objections to Request No. 3.

16) A copy of all literature, warnings, alerts, etc. provided to Stamford Hospital and Brian J. Hines, M.D. regarding the complication rates of pelvic mesh products.

OBJECTION TO REQUEST NO. 16:

Ethicon objects to Request No. 16 on the grounds that it is overbroad, unduly burdensome and vague. Ethicon further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege and/or the work product immunity. Ethicon further objects to this Request on the grounds that it seeks the production of information that is confidential, proprietary business information and/or trade secrets.

Ethicon further objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

- 17) A copy of any statements as defined in Practice Book § 13-1 made to Johnson & Johnson or by Ethicon, its agents, servants and/or employees involving any complication(s) or adverse event(s) involving or related to pelvic mesh products.**

OBJECTION TO REQUEST NO. 17:

Ethicon objects to Request No. 17 on the grounds that it is overbroad, unduly burdensome and vague. Ethicon objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege and/or the work product immunity. Ethicon further objects to this Request on the grounds that it seeks the production of information that is confidential, proprietary business information and/or trade secrets. Ethicon further objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

- 18) A copy of the documents that are the subject of Interrogatory #26.**

OBJECTION TO REQUEST NO. 18:

Ethicon refers to its Objections to Request No. 3.

- 19) A copy of the documents that are the subject of Interrogatory #27.**

OBJECTION TO REQUEST NO. 19:

Ethicon objects to Request No. 19 as overbroad, unduly burdensome, vague, ambiguous, argumentative, calling for legal conclusions and/or speculation. Ethicon objects to

this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon interprets this Request as a request for information relating to the regulatory process. Ethicon objects to this Request on the grounds that it assumes facts neither in evidence nor admitted. Defendant denies any allegations contained in this Request. Ethicon further objects to this Request on the grounds that it seeks the production of documents that are protected by the attorney-client privilege and/or work product immunity. Ethicon further objects to this Request on the grounds that it seeks the production of information that is confidential, proprietary business information and/or trade secrets. Ethicon further objects to this Request on the ground that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ethicon also objects to this Request to the extent that it requests information that is protected by HIPAA, other federal and state privacy laws, and the medical privilege laws of applicable states.

20) A copy of the documents that are the subject of Interrogatory #28.

OBJECTION TO REQUEST NO. 20:

Ethicon objects to Request No. 20 on the grounds that it is overbroad, unduly burdensome, vague and ambiguous. Ethicon objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon further objects to this Request on the grounds that it seeks the production of documents that are protected by the attorney-client privilege and/or work product immunity. Ethicon further objects to this Request on the grounds that it seeks the production of information that is confidential,

proprietary business information and/or trade secrets. Ethicon further objects to this Request on the ground that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

21) A copy of the documents that are the subject of Interrogatory #29.

OBJECTION TO REQUEST NO. 21:

Ethicon objects to Request No. 21 on the grounds that it is overbroad, unduly burdensome, vague, ambiguous, argumentative, and calls for legal conclusions and/or speculation. Ethicon objects to this Request on the grounds that it assumes facts neither in evidence nor admitted. Defendant denies any allegations contained in this Request. Ethicon objects to this Request on the grounds that it seeks, in part, information which is publicly available and therefore equally accessible to Plaintiff as it is to Defendant. Ethicon further objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon further objects to this Request on the ground that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

22) A copy of the documents that are the subject of Interrogatory #30.

OBJECTION TO REQUEST NO. 22:

Ethicon objects to Request No. 22 on the grounds that it is overbroad, unduly burdensome, vague, ambiguous and confusing. Ethicon further objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon further objects to this Request on the grounds that it seeks information that is protected by the attorney-

client privilege and/or work product immunity. Ethicon further objects to this Response on the grounds that it seeks information that is confidential, proprietary business information and/or trade secrets.

23) A copy of the documents that are the subject of Interrogatory #31.

OBJECTION TO REQUEST NO. 23:

Ethicon objects to Request No. 23 on the grounds that it is overbroad, unduly burdensome, vague, ambiguous and confusing. Ethicon further objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege and/or work product immunity. Ethicon further objects to this Request on the grounds that it seeks information that is confidential, proprietary business information and/or trade secrets.

24) A copy of the documents that are the subject of Interrogatory #32.

OBJECTION TO REQUEST NO. 24:

Ethicon refers to its Objections to Request No. 23.

25) A copy of the documents that are the subject of Interrogatory #33.

OBJECTION TO REQUEST NO. 25:

Ethicon objects to this Request No. 25 on the grounds that it is overbroad, unduly burdensome, vague, ambiguous and confusing. Ethicon further objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon further objects to

this Request on the grounds that it seeks information that is protected by the attorney-client privilege and/or work product immunity. Ethicon further objects to this Request on the grounds that it seeks information that is confidential, proprietary business information and/or trade secrets.

26) A copy of the documents that are the subject of Interrogatory #34.

OBJECTION TO REQUEST NO. 26:

Ethicon objects to Request No. 26 on the grounds that it is overbroad, unduly burdensome, vague, ambiguous and confusing. Ethicon further objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege and/or work product immunity. Ethicon further objects to this Request on the grounds that it seeks information that is confidential, proprietary business information and/or trade secrets.

27) A copy of the documents that are the subject of Interrogatory #35.

OBJECTION TO REQUEST NO. 27:

Ethicon objects to Request No. 27 on the grounds that it is overbroad, unduly burdensome, vague, ambiguous, and confusing. Ethicon further objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon objects to this Request to the extent it seeks information which is publicly available and therefore equally accessible to Plaintiff as it is to Defendant.

28) A copy of all communications with Dr. Hines or his office regarding pelvic mesh products.

OBJECTION TO REQUEST NO. 28:

Ethicon objects to Request No. 28 on the grounds that it is overbroad, unduly burdensome and vague. Ethicon further objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege and/or the work product immunity. Ethicon further objects to this Request on the grounds that it seeks the production of information that is confidential, proprietary business information and/or trade secrets. Ethicon further objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

29) All communications and agreements with Dr. Hines regarding his Consultation and Surgical Instructor work.

OBJECTION TO REQUEST NO. 29:

Ethicon objects to Request No. 29 on the grounds that it is overbroad, unduly burdensome and vague. Ethicon further objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege and/or the work product immunity. Ethicon further objects to this Request on the grounds that it seeks the production of information that is confidential, proprietary business information and/or trade secrets. Ethicon further objects to this Request on the grounds that

it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

30) A copy of the documents referred to in Interrogatory #36.

OBJECTION TO REQUEST NO. 30:

Ethicon objects to Request No. 30 on the grounds that it is overbroad, unduly burdensome, vague, ambiguous, and confusing. Ethicon further objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon objects to this Request on the grounds that it seeks, in part, information which is publicly available and therefore equally accessible to Plaintiff as it is to Defendant.

31) A copy of the sales or transfer documents of the product(s) referred to in Interrogatory #37.

OBJECTION TO REQUEST NO. 31:

Ethicon objects to Request No. 31 on the grounds that it is overbroad, unduly burdensome, vague, ambiguous and confusing. Ethicon further objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon further objects to this Request as argumentative and calling for legal conclusions and/or speculation. Ethicon further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege and/or work product immunity. Ethicon further objects to this Request on the grounds that it seeks information that is confidential, proprietary business information and/or trade secrets.

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extent they seek information from corporate entities other than Ethicon, including, but not limited to, Johnson & Johnson.

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REQUESTS FOR PRODUCTION

2) A copy of the documents identified in response to Interrogatory # 3.

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Ethicon refers to its Objections to Request No. 4.

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- 8) A copy of the expert's current curriculum vitae and any file of any experts referred to in Interrogatory #9.**

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- 9) Any documents disclosed to other Plaintiff or by other plaintiffs in relation to any other pelvic mesh litigation in which Johnson & Johnson is involved.**

OBJECTION TO REQUEST NO. 9:

Ethicon objects to Request No. 9 on the grounds that it is overbroad, unduly burdensome and vague. Ethicon further objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit. Ethicon further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege and/or the work product immunity. Ethicon further objects to this Request on the grounds that it seeks the production of information that is confidential, proprietary business information and/or trade secrets. Ethicon further objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

- 10) A copy of any documents that are the subject of Interrogatory # 16.

OBJECTION TO REQUEST NO. 10:

Ethicon refers to its Objections to Request No. 3.

- 11) A copy of any documents that are the subject of Interrogatory #18.

OBJECTION TO REQUEST NO. 11:

Ethicon objects to Request No. 11 on the grounds that it is overbroad, unduly burdensome, vague, ambiguous and confusing. Ethicon further objects to this Request on the ground that it seeks the production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ethicon further objects to this Request on the grounds that Ethicon does not render medical services to any individual, including plaintiff Robin Sherwood.

- 13) A copy of any documents that contain the information that is the subject of Interrogatory #22.

OBJECTION TO REQUEST NO. 13:

Ethicon objects to Request No. 13 as overbroad, unduly burdensome, vague, ambiguous, argumentative, calling for legal conclusions and/or speculation. Ethicon objects to this Request on the grounds that it assumes facts neither in evidence nor admitted. Defendant denies any allegations contained in this Request. Ethicon objects to this Request to the extent that it seeks, in part, information which is publicly available and therefore equally accessible to Plaintiff as it is to Defendant. Ethicon further objects to this Request on the ground that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ethicon also objects to this Request to the

extent that it requests information that is protected by HIPAA, other federal and state privacy laws, and the medical privilege laws of applicable states.

14) The documents contain [sic] in the file referenced in #25.

OBJECTION TO REQUEST NO. 14:

Ethicon objects to Request No. 14 on the grounds that it is overbroad, unduly burdensome, vague, ambiguous and confusing. Ethicon further objects to this Request on the ground that it seeks the production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ethicon further objects to this Request on the grounds that it seeks the production of documents that are protected by the attorney-client privilege and/or work product immunity. Ethicon further objects to this Request on the grounds that it seeks the production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

15) All reports submitted to you by Stamford Hospital related to pelvic mesh products.

OBJECTION TO REQUEST NO. 15:

Ethicon refers to its Objections to Request No. 3.

16) A copy of all literature, warnings, alerts, etc. provided to Stamford Hospital and Brian J. Hines, M.D. regarding the complication rates of pelvic mesh products.

OBJECTION TO REQUEST NO. 16:

Ethicon objects to Request No. 16 on the grounds that it is overbroad, unduly burdensome and vague. Ethicon further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege and/or the work product immunity. Ethicon further objects to this Request on the grounds that it seeks the production of information that is confidential, proprietary business information and/or trade secrets.

Ethicon further objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

- 17) A copy of any statements as defined in Practice Book § 13-1 made to Johnson & Johnson or by Ethicon, its agents, servants and/or employees involving any complication(s) or adverse event(s) involving or related to pelvic mesh products.**

OBJECTION TO REQUEST NO. 17:

Ethicon objects to Request No. 17 on the grounds that it is overbroad, unduly burdensome and vague. Ethicon objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege and/or the work product immunity. Ethicon further objects to this Request on the grounds that it seeks the production of information that is confidential, proprietary business information and/or trade secrets. Ethicon further objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

- 18) A copy of the documents that are the subject of Interrogatory #26.**

OBJECTION TO REQUEST NO. 18:

Ethicon refers to its Objections to Request No. 3.

- 19) A copy of the documents that are the subject of Interrogatory #27.**

OBJECTION TO REQUEST NO. 19:

Ethicon objects to Request No. 19 as overbroad, unduly burdensome, vague, ambiguous, argumentative, calling for legal conclusions and/or speculation. Ethicon objects to

32) A copy of any communication regarding the subject matter of Interrogatory #38.

OBJECTION TO REQUEST NO. 32:

Ethicon refers to its Objections to Request No. 31.

33) A copy of the documents submitted to the FDA as part of the FDA 501k (sic) approval process.

OBJECTION TO REQUEST NO. 33:

Ethicon objects to Document Request No. 33 on the grounds that it is overbroad, unduly burdensome, vague and ambiguous. Ethicon further objects to this Request to the extent that it seeks information or material pertaining to any product that is not the subject of this lawsuit and/or that Ethicon did not manufacture or distribute. Ethicon further objects to this Request on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Ethicon objects to this Request as calling for information that is protected by the attorney-client privilege and the work product doctrine. Ethicon also objects to this Request on the grounds that it seeks information that is confidential, proprietary business information and/or trade secrets.

Respectfully submitted,

THIRD PARTY DEFENDANT,
ETHICON, INC.

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that on October 7, 2016, a copy of the foregoing Ethicon, Inc.'s Objections to Plaintiffs' Requests for Production was sent via email to the following counsel of record:

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